

**APPEAL, WDREF, CLMAGT, JNTADMN**

**U.S. Bankruptcy Court  
California Northern Bankruptcy Court (San Francisco)  
Bankruptcy Petition #: 19-30088**

*Assigned to:* Judge Dennis Montali  
Chapter 11  
Voluntary  
Asset

*Date filed:* 01/29/2019  
*Plan confirmed:* 06/20/2020  
*341 meeting:* 04/29/2019  
*Deadline for filing claims:* 10/21/2019  
*Deadline for filing claims (govt.):* 10/21/2019

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Entered: 09/23/21 08:51:43 Page 6  
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Filing Date	#	Docket Text
09/07/2021	<u>11202</u>	Statement of Issues on Appeal, <i>and Designation of Record</i> (RE: related document(s) <u>11199</u> Notice of Appeal filed by Debtor Accountant PricewaterhouseCoopers LLP). Filed by Debtor Accountant PricewaterhouseCoopers LLP (Cave, Matthew) (Entered: 09/07/2021)
09/21/2021	<u>11281</u>	Appellee Designation of Contents for Inclusion in Record of Appeal (RE: related document(s) <u>11199</u> Notice of Appeal filed by Debtor Accountant PricewaterhouseCoopers LLP). Filed by Other Prof. John K. Trotter (Borges, Evan) (Entered: 09/21/2021)

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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14 In re:  
15 PG&E CORPORATION  
16 -and-  
17 PACIFIC GAS AND ELECTRIC  
18 COMPANY,  
19 Debtors.

CASE NO. 19-30088 (DM)  
Chapter 11

**PRICEWATERHOUSECOOPERS  
LLP'S STATEMENT OF ISSUES  
AND DESIGNATION OF RECORD  
ON APPEAL**

1 Pursuant to Federal Rules of Bankruptcy Procedure (“FRBP”) Rule 8009,  
2 PricewaterhouseCoopers LLP (“PwC”) hereby submits the following statement of  
3 the issues to be presented and designation of the items to be included in the record  
4 on appeal of the Bankruptcy Court’s order dated August 24, 2021 (the “Order”)  
5 compelling PwC’s compliance with a Rule 2004 Subpoena in relation to the General  
6 Rate Case documents in the above-captioned proceeding.

7

8 **I. STATEMENT OF ISSUES ON APPEAL**

9 Was the Bankruptcy Court’s finding that the Trustee of the Fire Victim  
10 Trust may obtain information that does not relate in any way to  
11 causation of the wildfires an abuse of discretion, given that the claims  
12 assigned by PG&E Corporation (“PG&E Corp.”) and its primary  
13 operating subsidiary, Pacific Gas and Electric Company (the “Utility”;  
14 together with PG&E Corp., “PG&E”), to the Trustee were limited to  
15 those relating to causation of the wildfires?

16

17 **II. DESIGNATION OF ITEMS TO BE INCLUDED IN THE**  
18 **RECORD**

19 PwC hereby designates the following items of record on appeal to be certified  
20 to the District Court pursuant to Bankruptcy Rule 8009(a)(1)(A) and (a)(4):

<u>Docket Number</u>	<u>Date</u>	<u>Description</u>
6351	3/17/2020	<i>Ex Parte</i> Motion of the Official Committee of Tort Claimants Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Entry of

1			An Order Authorizing Service of a Subpoena on PricewaterhouseCoopers LLP
2	6351-2	3/17/2020	Rule 2004 Subpoena – Exhibit B to <i>Ex Parte</i> Motion of the Official Committee of Tort Claimants Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Entry of An Order Authorizing Service of a Subpoena on PricewaterhouseCoopers LLP
3	6866	4/21/2020	Order Regarding Rule 2004 Applications Filed by the Official Committee of Tort Claimants
4	7711	6/2/2020	Stipulation Addressing Certain Plan Confirmation Objections of the Official Tort Claimants Committee
5	7711-1	6/2/2020	Schedule of Assigned Rights and Causes of Action – Exhibit A to Stipulation Addressing Certain Plan Confirmation Objections of the Official Tort Claimants Committee
6	7718	6/2/2020	Order Approving Stipulation Addressing Certain Plan Confirmation Objections of the Official Tort Claimants Committee
7	8048	6/19/2020	Amended Chapter 11 Plan Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 Filed by Debtor PG&E Corporation
8	8053	6/20/2020	Order Confirming Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 and Notice of Order Confirming Plan
9	8480	7/22/2020	Order Regarding Transfer of Pending Rule 2004 Examinations to the Wildfire Victim Trust

1	11055	8/11/2021	Order Compelling PricewaterhouseCoopers LLP's Compliance with Rule 2004 Subpoena
2	11109	8/19/2021	Trustee's Letter Brief/Memorandum in support of Fire Victim Trustee's Request for PricewaterhouseCoopers LLP's Documents Relating to PG&E's General Rate Case
3	11133	8/19/2021	PricewaterhouseCoopers LLP's Letter Brief/Memorandum in opposition of Fire Victim Trustee's Request for PricewaterhouseCoopers LLP's Documents Relating to PG&E's General Rate Case
4	11145	8/24/2021	Order Compelling PricewaterhouseCoopers LLP's Compliance with Rule 2004 Subpoena in Relation to the General Rate Case Documents

13 Dated: September 7, 2021

14 KIBLER FOWLER & CAVE LLP

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7 **UNITED STATES BANKRUPTCY COURT**

8 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10 **In re:**

11 **PG&E CORPORATION**

12 **-and-**

13 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

14 **Debtors.**

15

16  Affects PG&E Corporation  
17  Affects Pacific Gas and Electric Company  
18  Affects both Debtors

19 *\*All papers shall be filed in the Lead Case,  
20 No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

DESIGNATION OF TRUSTEE OF FIRE  
VICTIM TRUST OF ADDITIONAL  
ITEMS FOR RECORD ON APPEAL

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1                   **I. DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD**

2                   Pursuant to Bankruptcy Rule 8009(a)(2), the Trustee hereby designates the following items  
3 to be included in the record on appeal in Case No. 21-cv-07118-HSG:

- 4                   1. **Dkt. No. 6473** (filed 3/24/2020): Order Granting the Ex Parte Application of the Official  
5                   Committee Of Tort Claimants Pursuant to Federal Rule of Bankruptcy Procedure 2004 for  
6                   Entry of an Order Authorizing Service of a Subpoena on PricewaterhouseCoopers LLP;
- 7                   2. **Dkt. No. 10913** (filed 7/13/2021): *Ex Parte* Application of the Fire Victim Trustee  
8                   Pursuant to Federal Rule of Bankruptcy Procedure 2004 for an Order Authorizing Service  
9                   of a Subpoena on PricewaterhouseCoopers LLP Employee Hugh Le;
- 10                   3. **Dkt. No. 10915** (filed 7/13/2021): Declaration of Sarah Kelly-Kilgore in Support of *Ex*  
11                   *Parte* Application of the Fire Victim Trustee Pursuant to Federal Rule of Bankruptcy  
12                   Procedure 2004 for Order Authorizing Service of a Subpoena on PricewaterhouseCoopers  
13                   LLP Employee Hugh Le;
- 14                   4. **Dkt. No. 10947** (filed 7/16/2021): Order Granting *Ex Parte* Application of the Fire Victim  
15                   Trustee Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Order Authorizing  
16                   Service of a Subpoena on PricewaterhouseCoopers LLP Employee Hugh Le.

17  
18                   DATED: September 21, 2021

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19                   By:



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